

MEMO ENDORSED

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August 30, 2018

By ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

USDC-SDNY
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**Re: *Doe v. The Weinstein Company LLC, et al.*,
18-CV-5414 (RA)**

Dear Judge Abrams:

We represent defendant Paul Tudor Jones in the above action. We write on behalf of Mr. Jones, defendants James Dolan, Richard Koenigsberg, Lance Maerov, Jeff Sackman, Bob Weinstein, and Dirk Ziff (together, "Defendants"), and plaintiff Jane Doe, to jointly request that Defendants' deadline to respond to the operative complaint in this action be adjusted.¹ More specifically, these parties request that the deadline to respond to the operative complaint is set so that Defendants must file any motions to dismiss or other response within a set period of time after Plaintiff's pending motion to amend is resolved.

By way of background, Plaintiff initiated this action and filed a First Amended Complaint in California state court. This action has since been removed to federal court, and transferred to the Southern District of New York. The Defendants currently have different deadlines for when they are scheduled to respond to the First Amended Complaint, generally between September 10, 2018 and September 14, 2018, based on when each Defendant waived service. (See, e.g., Dkts. 40-41, 43-47.)

On August 2, 2018, Plaintiff filed a motion for leave to file a Second Amended Complaint. (See Dkts. 62, 64.) That motion remains pending, and is scheduled to be fully briefed by September 28, 2018. (Dkt. 67.)

The Court has already set an order making clear that defendant Tim Sarnoff's "time to move to dismiss or otherwise respond to the operative complaint is adjourned until: (a)

¹ Defendants Tim Sarnoff and Harvey Weinstein also consent to this request.

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30 days after entry of an order denying the motion to amend, in which case they shall respond to the [First Amended Complaint]; or (b) 30 days after the filing of a Second Amended Complaint ("SAC") in the event the Court enters an order granting the filing of a SAC." (Dkt. 35.) The parties identified above jointly request that Defendants' deadline to respond to the operative complaint is similarly adjusted, so that each Defendant need only file a single responsive pleading to the pertinent complaint and so that Defendants may do so on the same schedule as Mr. Sarnoff. This is Defendants' first request for an extension in connection with this matter.

Thank you for your consideration.

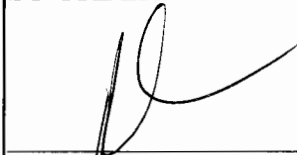
Respectfully,

/s/ James V. Masella, III

James V. Masella, III

Application granted. All Defendants who have appeared in this action shall have until either (a) 30 days after entry of an order denying the motion to amend, in which case they shall respond to the First Amended Complaint, or (b) 30 days after the filing of a Second Amended Complaint ("SAC"), in the event the Court enters an order granting the filing of a SAC, to answer or otherwise respond to the operative pleading.

SO ORDERED.



Hon. Ronnie Abrams

8/30/2018